

2011-456-C



**Windstream South Carolina, LLC**  
236 West Center Avenue  
Mooresville, NC 28115

**Jayne Eve**  
*Vice President – External Affairs*

704-660-6680  
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jayne.t.eve@windstream.com

November 1, 2011  
(11)

The Honorable Jocelyn Boyd, Chief Clerk  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Windstream South Carolina, LLC Petition Requesting the Commission's  
Intervention in Numbering Resources Determination for the Kershaw Rate Center

Dear Ms. Boyd:

Windstream South Carolina, LLC ("Windstream") requests a state waiver from the Public Service Commission of South Carolina to grant assignment of their request to the North American Numbering Plan Administrator ("NANPA") for additional numbering resources in the Kershaw, SC rate center.

Windstream has commenced work on its U.S. Department of Agriculture Rural Utilities Service Broadband Initiatives Program ("BIP") projects that are being partially funded by the American Recovery and Reinvestment Act. These projects entail deploying packet switches that will be compatible with the new broadband infrastructure. Such packet switches require their own location routing numbers ("LRNs") distinct from those currently assigned to Windstream's legacy time division multiplexing ("TDM") switches. Industry guidelines state that "[a] unique LRN will be provisioned to identify each recipient switch or POI in the number portability capable network" and that "a service provider will establish one (1) LRN per LATA from an assigned NXX for each recipient switch or POI in the number portability capable network." Windstream does not have any NXX codes that could be moved for the purpose of establishing an LRN.

Under existing procedures, NANPA looks only at the number of Months-To-Exhaust ("MTE") for the entire rate center as stated in ATIS' Central Office Code Assignment Guidelines (COCAG). Per section 4.3.1 of the COCAG, the MTE and utilization requirements state a service provider must be 75% utilized in current numbering resources for the rate center and demonstrate that existing codes for the rate center will exhaust within six months.

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\* Alliance for Telecommunications Industry Solutions, *Location Routing Number (LRN) Assignment Practices*, ATIS-0300065, September 30, 2011, at 1 (available at <<http://www.atis.org/inc/Docs/finaldocs/LRN-Assignment-Practices-Final-Docment-09-30-11.doc>>).

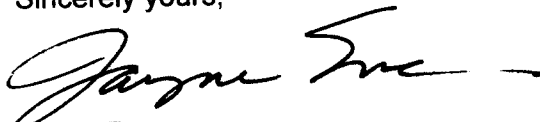
Windstream submitted an application on October 10, 2011 for the Kershaw rate center (KRSHSCXBPS0) to the Pooling Administrator ("PA") for the purpose of establishing a new LRN for the new packet switch in LATA 422, Charlotte, North Carolina (see Attachment A). The PA denied the request because Windstream did not meet the MTE criteria nor the utilization criteria (see Attachment B).

The NANPA's denial of Windstream's request impairs Windstream's ability to establish the new POI in the Kershaw rate center. This situation is in direct conflict with (1) one stated goal of the FCC which is to ensure that all carriers have the numbering resources they need to compete in the rapidly growing telecommunications marketplace, and (2) the requirement for an LRN for each switch and/or POI in order to perform number porting.

Windstream respectfully requests the Commission enter an Order reversing NeuStar's denial of Windstream's request for additional numbering resources and direct NANPA and/or the PA to assign Windstream an NXX for the purpose of establishing an LRN for the new switch in the Kershaw rate center as soon as possible.

Please do not hesitate to contact me at 704-660-6680 if you have any questions or wish to discuss this matter.

Sincerely yours,



Jayne Eve

cc: Nanette Edwards – Counsel, Office of Regulatory Staff

Attachment A

Central Office Code (NXX) Assignment Request  
Part 1 December 9, 2005Tracking  
Number: **803-KERSHAW-SC-488795****Full**  
**NXX:**  
**LRN**Type of  
Application: ☒ New ☐ Change ☐ Delete**1.0 GENERAL INFORMATION****1.1 Contact Information:**Code Applicant:Company/Entity  
Name: **WINDSTREAM SOUTH CAROLINA, INC.**Headquarters  
Address: **4001 Rodney Parham Rd**City, State, Zip: **Little Rock ,AR ,72212**Contact Name: **Paula Hustead**Contact  
Address: **10005 Monroe Rd, B1F01**City,State,Zip: **Matthews, NC, 28105**Phone: **704-845-7489** FAX: **E-**  
mail: **paula.hustead@windstream.com**Code Administrator: <sup>2</sup>Name: **Michael Ortega**Address: **46000 Center Oak Plaza**City,State,Zip: **Sterling ,VA ,20166**Phone: **571-434-5348** FAX: **571-434-5502**NXX: <sup>3</sup> LATA: **422**  
**1.2 NPA: 803** OCN: <sup>4</sup> **0517** Parent  
Company's OCN(s) **G118**Switching Identification(Switch Entity/POI) <sup>5</sup>  
**KRSHSCXBPS0**Locality/City/Wire Center: Rate Center: <sup>6</sup> **KERSHAW**Homing Tandem Tandem Homing  
Operating Co: <sup>7</sup> **ROCK** CLLI  
**HILL TEL CO** <sup>8</sup> : **RCHLSCXB02T****1.3 Dates:** Date of

Application: **10/10/2011** Request Effective Date: <sup>9 10</sup>  
12/15/2011

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? Yes \_\_\_\_\_ No X

1.4 a) Type of company/entity requesting the code: Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)

b) Types of service: Wireline (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) \_\_\_\_\_

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of change (Mark **all** that apply)

☐ OCN-Intra-company <sup>11</sup> ☐ Switching Id ☐ Rate Center ☐  
Tandem Homing CLLI

☐ OCN-Inter-company <sup>12</sup> ☐ Effective Date ☐ LATA ☐ Extend  
Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: <sup>13</sup> ☒ Yes ☐  
No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.8 It is the code applicant's responsibility to arrange input of Part 2

information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

**Need an LRN on a new packet switch to support deployment of broadband Stimulus project**

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: <sup>14</sup>

**Paula Husted**

Signature of Code Applicant

**CODE**

**ADMINISTRATION**

Title

**10/10/2011**

Date

<sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code (s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia<sup>TM</sup> Routing Administration (TRA) on 732-699-6700.

<sup>5</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia<sup>TM</sup> COMMON LANGUAGE CLLI<sup>TM</sup> Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup> Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup> Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup> An incomplete form may result in delays in processing this request.

## TBPAG Attachment 1 - March 19, 2007

## Thousands-Block Application Form - Part 1A

**Tracking**      **803-KERSHAW-**  
**Number:**      **SC-488795**  
                    **Full NXX: LRN**

**Type of**                      ☐ **Change** ☐  
**Application:**    ☒ **New**                      ☐ **Disconnect**

**GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**

**Company**                      **WINDSTREAM SOUTH CAROLINA, INC.**  
**Name:**

**Headquarters**                      **4001 Rodney Parham Rd**  
**Address:**

**City, State,**                      **Little Rock, AR, 72212**  
**Zip:**

**Contact**                      **Paula Hustead**  
**Name:**

**Contact**                      **10005 Monroe Rd, B1F01**  
**Address:**

**City,State,Zip:** **Matthews , NC , 28105**

**Phone:** **704-**                      **FAX: \_**                      **E-mail: paula.hustead@windstream.com**  
**845-7489**

**Pooling Administrator: ii**

**Contact**                      **John Auerbach**  
**Name:**

**Contact**                      **1800 Sutter St. Ste. 780**  
**Address:**

**City,State,Zip:** **Concord ,CA,94520**

**Phone:**                      **925-363-8706**                      **FAX: 925-363-7684**

**E-mail: john.auerbach@neustar.biz**

**1.2 General Information:**

**Check one : No LRN needed \_\_\_\_\_ LRN needed <sup>iii</sup>   X**

NPA: 803 LATA: 422 OCN: <sup>iv</sup>0517 Parent Company's OCN G118

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : <sup>v</sup>  
KRSHSCXBPS0

City or Wire Center Name : \_\_\_\_\_ Rate Center: <sup>vi</sup> KERSHAW

Rate Center Sub Zone: \_\_\_\_\_

### 1.3 Dates:

Date of Application: <sup>vii</sup> 10/10/2011 Requested Block Effective Date: <sup>viii</sup> 12/15/2011

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes \_\_\_\_\_ No X

### 1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC) (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) \_\_\_\_\_
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) 803-xxx-4,

### 1.5 Type of Request:

Initial block for rate center : Yes \_\_\_\_\_ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes , attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

☐ OCN:Intra-company <sup>ix</sup> ☐ Switching Id ☐ Part 1B



☐ OCN:Inter-company <sup>x</sup> ☐ Effective Date

Change block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

### 1.6 Block Return :

- a) Is this block Contaminated Yes \_\_\_\_\_ No \_\_\_\_\_
- b) If Yes how many TNs are NOT available for assignment : \_\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC Yes \_\_\_\_\_ No \_\_\_\_\_
- d) Has this block been protected from further assignment Yes \_\_\_\_\_ No \_\_\_\_\_

Disconnect block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

Remarks: **Need an LRN on a new packet switch to support deployment of broadband Stimulus project**

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**Paula Hustead**

**Signature of Block Applicant**

**CODE**

**ADMINISTRATION**

**Title**

**10/10/2011**

**Date**

### **Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia<sup>TM</sup> LERG<sup>TM</sup> Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia<sup>TM</sup> Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI<sup>TM</sup> tandem of the facilities based provider <sup>xi</sup>. Explanations of these terms may be found in the footnotes.

**Section 1.3** The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

**Section 1.4** Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

**Section 1.5** Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

**Section 1.6** Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Foot Notes :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA.

<sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

<sup>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

## Appendix 3

May 16, 2008

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>**  
**(Thousands-Block Number Pooling Growth Block Request)**

Tracking Number: **803-KERSHAW-SC-488795**Date: **10/10/2011**OCN: **0517**Company Name: **WINDSTREAM SOUTH CAROLINA, INC.**Rate Center: **KERSHAW**List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): **803-475**Name of Block Applicant: **Paula Hustead**Signature: **Paula Hustead**Title: **CODE ADMINISTRATION**  
No.:Telephone No.: **704-845-7489**

FAX

E-mail: **paula.hustead@windstream.com**A. Available Numbers: **5654**B. Assigned Numbers: **3864**C. Total Numbering Resources: **10000**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: **0**List  
Excluded  
Code(s) or  
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth History - Previous 6	<b><u>88</u></b>	<b><u>2</u></b>	<b><u>7</u></b>	<b><u>7</u></b>	<b><u>12</u></b>	<b><u>20</u></b>
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months<sup>3</sup>

F. Forecast

- Next 12 months<sup>4</sup>

<u>9</u>	<u>9</u>	<u>10</u>	<u>10</u>	<u>11</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>15</u>
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 10.0

H. Months to Exhaust<sup>5</sup>

$$= \frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$
Block Requested**1**Available Numbers**5654**Months To Exhaust**565.40**

I. Utilization<sup>6</sup>

$$= \frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$$
**38.64**

Explanation: \_\_\_\_\_

<sup>1</sup> A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup>Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>3</sup>Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

<sup>4</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

<sup>6</sup>Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Attachment B

Attachment 3

November 21, 2003  
ATIS-0300066.at3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 803-KERSHAW-SC-488795

Date of Application: 10/10/2011 Effective Date: \_\_\_\_\_  
Date of Receipt: 10/10/2011 Date of Response: 10/10/2011

Service Provider Name: WINDSTREAM SOUTH CAROLINA, INC.  
(Telcordia™ LERG™  
Routing Guide ) OCN: 0517

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

John Auerbach Phone: 925-363-8706  
Signature of Pooling Administrator  
John Auerbach Fax: 925-363-7684  
Name (print)  
Email: john.auerbach@neustar.blz

NPA-NXX or NPA-  
NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_  
Block Reserved : \_\_\_\_\_  
Block Reservation  
Expiration Date : \_\_\_\_\_  
Block/Code Modified : \_\_\_\_\_  
Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated(Yes or No) : \_\_\_\_\_  
If Yes, enter the number of TNs contaminated : \_\_\_\_\_

Switch Identification(Switch Entity/POI): <sup>1</sup> KRSHSCXBPS0  
Rate Center: KERSHAW  
Rate Center Sub Zone: \_\_\_\_\_

☒ Form Complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

\_\_\_ **Request withdrawn.**

Explanation:

\_\_\_ **Assignment activity suspended by the administrator.**

Explanation:

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**Remarks:**

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<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)